

05 APR 1985

Janet

Mr. Dave Shotwell
Chief, Bureau of Compliance
& Enforcement
Division of Waste Management
New Jersey Department of Environmental
Protection
120 Route 156
Yardville, New Jersey 08620

Dear Mr. Shotwell:

The Environmental Protection Agency (EPA) conducted a non-major Resource Conservation and Recovery Act (RCRA) inspection at Becton-Dickenson in E. Rutherford on March 19, 1985. The facility is a non-major TSD with Interim Status. Although this is a deviation from present policy, the Northern Regional Office was informed of the inspection and had no objections to EPA performing the inspection. The site had never been inspected by EPA or NJDEP for hazardous waste compliance nor was it scheduled to be inspected by NJDEP this fiscal year. Eighteen violations were noted during the inspection. These are summarized on the third page of the enclosed inspection report. The Class I violations were for storing ignitable waste within 50 feet of the property line, having five containers holding hazardous waste without labels and having an inadequate closure plan.

It should be noted that EPA is presently reviewing Becton-Dickenson's closure plan as a formal record review to ensure compliance with the Interim Status standards. It appears an administrative complaint will be issued to the company in the next few weeks as a result of our record review.

In addition, the inspector noted in her report that Becton-Dickenson has ceased using its underground tanks to store hazardous waste. The facility intends to remove the tanks in the near future. The inspector appraised the company that it would have to submit a closure plan to NJDEP for approval prior to any dismantling of the tanks.

Lastly, the facility contact has changed since Becton-Dickenson submitted its Part A permit application. The new facility contact is Ted Tideman, Senior Facility Engineer, his telephone number is 201/460-2810. Any formal correspondence with the company should be directed to George Reisch, Vice President of Manufacturing, Becton-Dickenson, Division of Rutherford, Stanley Street, E. Rutherford, New Jersey 07073. General response and carbon copies of formal correspondence should be sent to John Beekhuysen, Facility Engineer Supervisor at the same address.

- 2 -

Please let me know within 30 days what action NJDEP intends to take as a result of this inspection. Should you have any questions regarding the inspection report, please contact Janet DeBiasio of my staff, at 212/264-5687.

Sincerely yours,

Stanley Siegel
Chief
Compliance & Enforcement Section

Enclosure

cc: Ron Corcory, Chief
Bureau of Field Operations, NJDEP (w/encl.)

bcc: Richard Baker, PAB (w/encl.)
Janet DeBiasio, SWB (w/o encl.)

INCOMPLETE
LETTER1. UNDERGROUND TANKS (con't.)

information in all their emergency vehicles. The map would also include locations for the storage of hazardous materials in drums.

2. WASTE & MATERIALS - In addition to location, data will be supplied to E. Rutherford listing all hazardous waste and materials together with material Safety Data Sheets on these materials, particularly for emergency squad use.
3. UTILITIES & SHUT-OFF LOCATIONS - B-D will furnish to E. Rutherford, as part of a complete data package, information on the type of utilities at B-D; their location; and the emergency shut-off locations. When the data package is ready, W. Griffith will review and if satisfactory, copies distributed to all E. Rutherford emergency groups.
4. DRILLS, TRAINING & INSPECTIONS - E. Rutherford personnel pointed out that a new Fire Safety Act will probably be adopted by the town in October which will require inspections 4 times a year.

It was suggested that an emergency drill could be arranged at B-D, which would involve E. Rutherford and other surrounding municipalities, at some time in the future, but that a walk through by the E. Rutherford officers of emergency units should be scheduled first and this will be done.

It was pointed out that B-D's security force will need further training in emergency procedures. However, they will not act as an emergency response team, which requires a high degree of sophisticated training and is best done by E. Rutherford personnel.

Both E. Rutherford and B-D personnel commented that this first meeting was very productive and informative and a good start to achieving our mutual objectives.

A subsequent meeting will be scheduled in September.

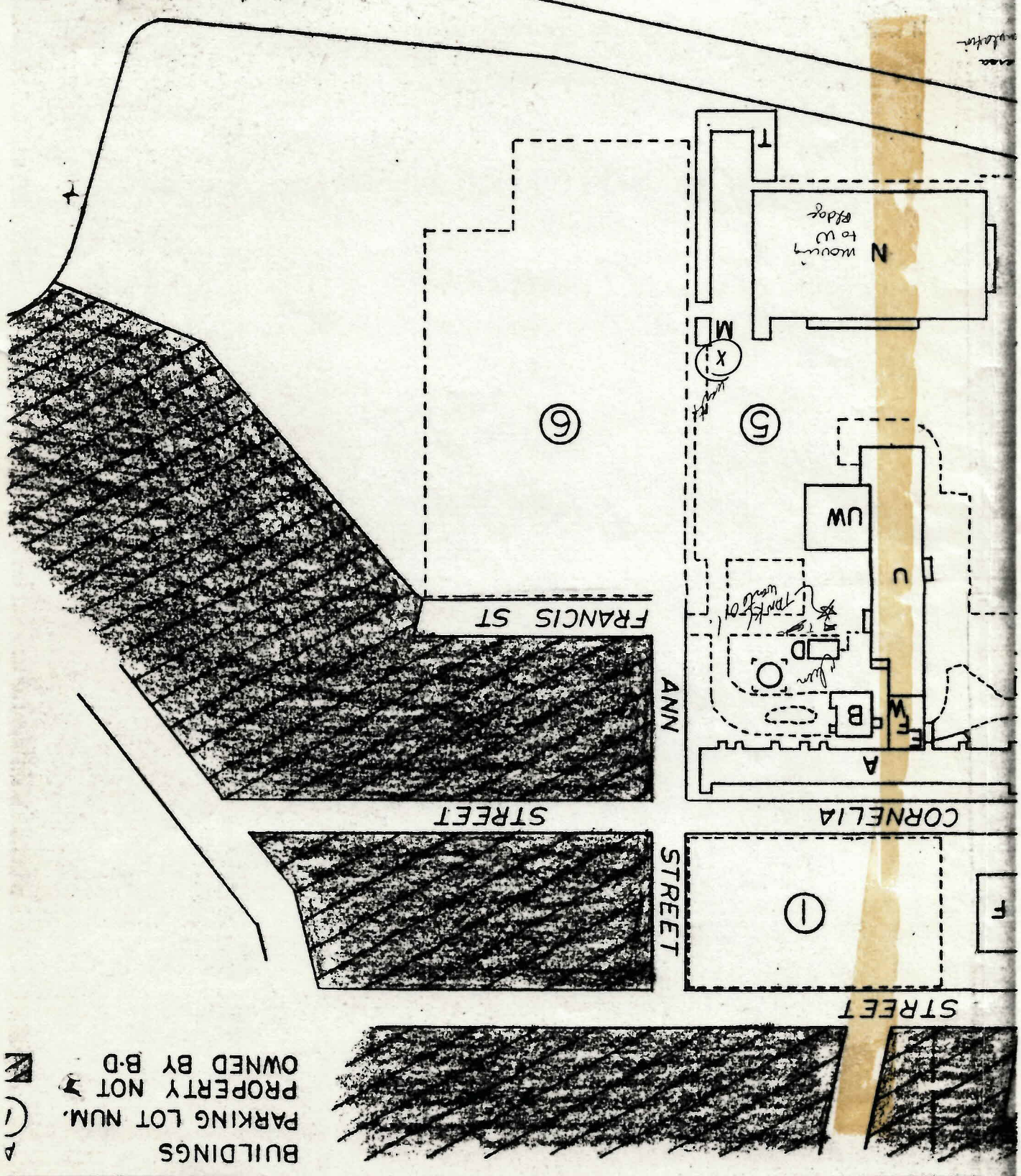
Attached to these minutes is a copy of our Plot Plan showing hazardous materials and their location. Also attached is the latest copy of B-D's emergency procedure for review and comment.



D. R. Rasmusson

/gd

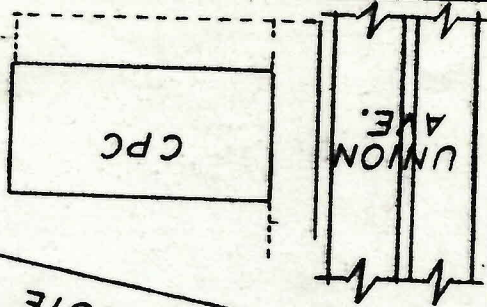
cc: Ruth. EPA/DEP Task Force &
Steering Committee



1 1/2 in - 1/2 in

JANUARY 6, 1983
DRAWN BY: W. WARE

BECTION DICKINSON & CO
GENERAL BUILDING LAYOUT
1" = 160'



X = drive storage area
□ point of accumulation

